

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

LEAGUE OF UNITED LATIN AMERICAN
CITIZENS, *et al.*,

Plaintiffs,

v.

GREG ABBOTT, in his official capacity as
Governor of the State of Texas, *et al.*,

Defendants.

CIVIL ACTION NO.
3:21-cv-00259-DCG-JES-JVB
[Lead Case]

LULAC PLAINTIFFS' ADVISORY AND RESPONSE TO STATE DEFENDANTS'
MOTION TO EXCLUDE EXPERT REPORTS AND TESTIMONY

Plaintiffs League of United Latin American Citizens, *et al.* ("LULAC Plaintiffs") file this advisory and response to State Defendants' Motion to Exclude Expert Reports and Testimony (Doc. 920) pursuant to the Court's order (Doc. 944).

LULAC Plaintiffs advise the Court that they do not intend to rely on the testimony of Dr. Jacob Grumbach in this case. LULAC Plaintiffs' pretrial disclosures do not include Dr. Grumbach on the witness list, and do not include any expert reports by Dr. Grumbach on the exhibit list. Doc. 943. Similarly, LULAC Plaintiffs' Notice of Filing of Expert Reports and associated bench binders do not include any expert reports by Dr. Grumbach. Doc. 937.

With respect to the pending motion to exclude, LULAC Plaintiffs respectfully urge the Court to deny the motion as moot, and have attached a proposed order to that effect.

Date: May 6, 2025

Respectfully submitted,

/s/ Nina Perales

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CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that she has electronically submitted a true and correct copy of the above and foregoing via the Court's electronic filing system on the 6th day of May 2025.

/s/ Nina Perales

Nina Perales